

**SYBRON**

R. JEFFREY HARRIS
VICE PRESIDENT, GENERAL COUNSEL
& SECRETARY

April 2, 1990

Timothy L. Williamson
Office of Regional Counsel
U.S. Environmental Protection Agency
J. F. Kennedy Federal Building, HSN-CAN5
Boston, MA. 02203

Superfund Records Center

SITE: Coakley
BREAK: 11.9
OTHER: 559395

RE: Coakley Landfill, New Hampshire

Dear Mr. Williamson:

I am submitting this letter at the suggestion of Sybron's outside counsel, Russell V. Randle, who informs me that he has discussed the subject matter of this letter with you. The purpose of this letter is to explain Sybron's relationship to Erie Scientific Company ("Erie"), which has been identified (although we think incorrectly) by the EPA as a PRP for the Coakley Superfund Site. Such an explanation is necessary because Sybron Corporation was added to the list of PRP's simply because Stephen Tomassi, one of Sybron Corporation's inside counsel, responded on Erie's behalf to the EPA's August 1988 information request, indicating himself as the Erie contact, with Sybron Corporation's address.

Erie Scientific Company is a wholly-owned subsidiary of Sybron Corporation, a Delaware corporation ("Sybron"). Sybron is a holding company, has no manufacturing operations, and has never had any manufacturing operations. Furthermore, Sybron does not do business in New Hampshire, and has never done business in New Hampshire. As a holding company, Sybron simply functions as a consolidating entity for its operating subsidiaries, and provides certain services to the operating subsidiaries. The services provided by Sybron to its operating subsidiaries, including Erie, include legal services. Steve Tomassi, one of two in-house lawyers of Sybron, was providing legal services to Erie when, by letter dated September 12, 1988, he responded to the EPA's August 1988 information request concerning Coakley on behalf of Erie. In this response, Mr. Tomassi identified himself as the person answering the request on behalf of Erie, and gave Sybron's address so the EPA could correspond with him. As a result, Sybron (including Mr.

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Tomassi's name) was added to the PRP list. It thus appears that Sybron's addition to the list of PRP's was mistaken. One can only conclude that if EPA's addition of Sybron to the PRP list was not a mistake, the list is nothing more than a mailing list and is not what it purports to be.

Accordingly, Sybron hereby requests that it be removed from the list of PRP's.

Yours very truly,



R. Jeffrey Harris

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cc Mr. Steven J. Calder
Russell V. Randle, Esq.